Earth Systems
Environmental Engineering

July 26, 2018

Via Certified Mail

Mr. Andrew Park
Hazardous Waste Programs Branch
US Environmental Protection Agency Region 2
290 Broadway, 22nd Floor
New York, New York 10007-1866

Re: AOC 10: Truck Loading Rack Remedial Investigation Workplan (RIW)
Hess Corporation Former Port Reading Complex (HC-PR)
750 Cliff Road
Woodbridge, Middlesex County, New Jersey
NJDEP PI# 006148
ISRA Case No. E20130449
EPA ID No. NJD045445483

Dear Mr. Park:

Earth Systems, Inc. (Earth Systems) has prepared this letter on behalf of Hess Corporation (Hess) in response to our June 6, 2018 meeting discussions regarding pre-clearing methods to be used during implementation of the above referenced revised Remedial Investigation Workplan (RIW).

The goal of the area of concern (AOC) 10 RIW is to complete delineation of Light Non-Aqueous Product (LNAPL) and residual soil impacts in order to develop a final remedial strategy. The licensed site remediation professional (LSRP) has determined that the pre-clearing technique described below, developed for the Hess Port Reading site only, will achieve the objectives of the RIW and result in sufficient usable data to design a remedial strategy for AOC 10 while minimizing safety concerns.

A series of soil borings will be cleared for utilities across the accessible portions of AOC 10 using a hand-auger. As discussed, Hess Corporate EHS Pre-Clearing for Remediation Drilling Standard Operating Procedure requires the drilling contractor to pre-clear to 8.0 feet below ground surface using hand auger or soft dig techniques for all boring and/or well locations in the vicinity of identified assets. Due to the potential

volatilization of compounds of concern using soft dig techniques, these borings will be cleared using a hand auger which is the best available technology for this task. This variance/deviation is based on health and safety concerns, as well as site specific drilling conditions associated with underground utilities at an active petroleum terminal and truck loading rack.

Soil samples will be collected by inserting an Encore© sampling device directly into the auger bucket or from minimally disturbed soil immediately after a bucket is emptied, as recommended in the EPA procedure. As stated in the approved RIW, these soil samples would be analyzed for Target Compound List Volatile Organic Compounds plus a forward library search (TCL VO+15) and Extractable Petroleum Hydrocarbons (EPH).

Field observations and analytical results will be evaluated both during and at the completion of the remedial investigation of AOC 10. The evaluation will acknowledge that soil samples collected for VOC analysis from 0 to 8 feet below grade will be potentially biased low and will require qualification. In addition, the evaluation will address the need to utilize multiple lines of evidence to gain a full understanding of surface and subsurface conditions in AOC 10 while factoring in any data gaps or qualified data resulting from applying the above referenced deviation/variance.

The Remedial Investigation Report (RIR) will include a data evaluation section documenting how samples were collected and the representativeness and usability of the data.

Should you have any questions or require additional clarification or information, please contact me at 732-739-6444 or via e-mail at jvirgie@earthsys.net. If you have any questions relating to the project and schedule moving forward, you can also contact Mr. John Schenkewitz of Hess Corporation at 609-406-3969.

Sincerely,

Earth Systems, Inc.

John Virgie
Sr. Client Manager

c. Mr. Phil Cole, NJDEP Case Manager (via 3 hard copies)
Mr. John Schenkewitz – Hess Corporation (via e-mail)
Mr. Rick Ofsanko – Earth Systems (via e-mail)